

IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
WESTERN DISTRICT OF VIRGINIA  
Lynchburg Division

IN RE: )  
 )  
BRUCE STUART BOONE, SR ) CASE # 24-60405-RBC  
MEREDITH BOONE, )  
 ) (Chapter 11)  
Debtors )  
\_\_\_\_\_ )

**APPLICATION TO EMPLOY ATTORNEY UNDER GENERAL RETAINER**

To: The Honorable Judges of this Court:  
The application of the Debtors respectfully represents:

1. On April 15, 2024 (the “Filing Date”), applicants filed their petition for reorganization under Chapter 11.
2. Applicants wish to retain Christopher S. Moffitt, an attorney duly qualified to practice in this Court (“Proposed Counsel”) and appoint him effective as of the Filing Date.
3. Applicants have selected Proposed Counsel for the reason that he has had considerable experience in matters of this character, and applicant believes him to be well qualified to represent him in this proceeding. Proposed Counsel’s current hourly rate is \$500.00, and that rate is subject to increase after an appropriate time.
4. The professional services which Proposed Counsel is to render are the general representation of applicant which may be necessary herein, with the exception of

tax, environmental and certain other litigation matters.

5. Applicants wish to employ Proposed Counsel under a general retainer because of the extensive legal services which applicants anticipate will be required.

6. To the best of Applicants' knowledge, Proposed Counsel does not have any interest adverse to the Applicants or their estates in any of the matters upon which he is to be engaged, and his employment would be in the best interests of this estate. Proposed Counsel's Declaration is attached.

WHEREFORE, applicants pray that the Court authorize them to employ Christopher S. Moffitt as his attorney under a general retainer effective April 15, 2024, and that the Applicant have such other and further relief as is just.

Respectfully submitted,

/s/ Christopher S. Moffitt  
Christopher S. Moffitt #18195  
218 North Lee Street  
Alexandria, Virginia 22314  
703/683-0075

*Proposed Counsel for Debtors*

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**DECLARATION OF PROPOSED COUNSEL**

I, Christopher S. Moffitt, hereby declare and affirm the following:

I am an attorney at law duly licensed to practice in this state and admitted to practice in this court; I am the only lawyer employed by the Law Offices of Christopher S. Moffitt.

1. To the best of my knowledge and belief, I have no connection with the Debtor, its creditors, any other party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the Office of the United States Trustee.
2. To the best of my knowledge and belief, I represent no interest adverse to the Debtor-in-Possession herein, or their estate in the matter upon which the firm is engaged.
3. No promises have been received by the undersigned as to compensation in connection with this case other than in accordance with the provisions of the Bankruptcy Code. I have no agreement with any other entity to share with such entity any compensation received by me in connection with this chapter 11 case.

I declare under penalty of perjury that the foregoing is true and correct (See 28 U.S.C. Section 1746).

April 22, 2024

/s/ Christopher S. Moffitt  
Christopher S. Moffitt  
Law Offices of Christopher S. Moffitt  
218 North Lee Street  
Alexandria, VA 22314  
703-683-0075 Phone  
703-997-8430 Facsimile  
[moffittlawoffices@gmail.com](mailto:moffittlawoffices@gmail.com)